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May 1, 2006

The Honorable Gregory M. Sleet  
United States District Court  
844 King Street  
Wilmington, Delaware 19801

VIA ELECTRONIC FILING

Re: *Telcordia Technologies, Inc. v. Alcatel S.A. and Alcatel USA, Inc.*,  
C.A. No. 04-874-GMS

*Telcordia Technologies, Inc. v. Lucent Technologies, Inc.*,  
C.A. No. 04-875-GMS

*Telcordia Technologies, Inc. v. Cisco Systems, Inc.*,  
C.A. No. 04-876-GMS

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Dear Judge Sleet:

I am Delaware counsel to Telcordia, plaintiff in the above three cases, in which a combined all-day *Markman* hearing has been scheduled to take place at 10:00 a.m. this Wednesday, May 3, 2006. I am writing to respectfully seek Your Honor's guidance regarding how the Court will allocate time to the parties at Wednesday's hearing.

The three defendants in these cases are taking shared positions on claim construction issues, and their briefing was a collaborative effort in which they divided up the issues and briefed everything collectively – with each defendant briefing certain assigned issues, and the others simply relying on those submissions rather than offering their own separate versions. Although defense counsel presumably will split up presentation duties at the hearing as well, the defendants essentially speak with one voice and will present a single harmonized defense position on all issues, without overlapping presentations by multiple defendants on the same issues.

Although we have no co-parties with which to divide duties in briefing or arguing the issues, Telcordia similarly will be making a presentation on all claim construction issues in all three cases. Accordingly, since Telcordia will present the plaintiff's position on all issues in all three cases on the one hand, and defense counsel collectively will present a single, unified defense position on all issues in all three cases on the other hand, we respectfully submit that the time should be divided on a 50/50 basis, with half allocated to Telcordia and half allocated to the defendants collectively. If no defendant is presenting a position on every issue, then there is no reason why every defendant needs an amount of time equal to what Telcordia needs.

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Conversely, if the time is divided into four equal parts (one for Telcordia and one for each defendant), then Telcordia will not possibly be able to cover many of the issues, and the Court will not have the benefit of presentations by both sides on all issues. We therefore believe that half the available time should be allotted to Telcordia, as would occur if these three cases had separate *Markman* hearings rather than a single combined hearing.

Defendants hopefully will not disagree with the foregoing reasoning, but since raising the issue with them on April 27th, we still have not received any response. With the hearing nearly upon us, we did not feel we could wait any longer without seeking the Court's guidance. As we finalize our preparations, we would be most grateful if Your Honor please could let the parties know how the Court wishes to proceed, so that no one is caught by surprise on the morning of the hearing.

Respectfully,

*/s/ Steven J. Balick*

Steven J. Balick

SJB/dmf  
169053.1

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